

DEC 09 1999

MS. GREEN: My name is Sandy Green, S-a-n-d-y, G-r-e-e-n. And I'm the vice chairman for the Board of Eureka County Commissioners.

I am here today on behalf of the Commission to make some preliminary comments on the adequacy of the Department of Energy's Draft Environmental Impact Statement on Yucca Mountain.

The Commission Chairman will provide additional comments at this evening's hearing.

1 We do appreciate the Department of Energy's willingness to come to Crescent Valley to hold these hearings in the area where the impacts could be. It means that the Department will be hearing today from local residents who could be affected by this proposal to build a branch rail line to transport high-level radioactive waste and spent nuclear fuel to Yucca Mountain.

Eureka County is one of the ten affected units of local government under Section 116 of the Nuclear Waste Policy Act as amended. The Commission is very concerned about the impacts that a proposed rail route could have on our county, especially Crescent Valley, and that the draft does not do a thorough or adequate job of identifying those impacts.

2 The draft does not adequately address the potential effects that this project could have on property values within our county. Our concern has several dimensions.

We are concerned about the potential loss of market value because of the stigma of a nuclear waste rail line in the county. And with our strong agricultural base in this county, the nuclear stigma would affect not only property values but also crop prices.

We are also aware that such stigma can stymie our efforts to diversify the local economy and to attract new enterprises to this county, not to mention retaining our existing businesses.

The recent nuclear accident in Japan is a case in point where both tourism and potential business were negatively impacted. The term for this is disinvestment, and we believe that this project could have that sort of impact on our county and on our state.

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3 One of the recurring comments I hear is that the proposed rail line is sited in a flood plain, in the playa which floods up to four feet in wet years. The draft contains information which has not been verified or ground truthed. The information in the document is insufficient to make an informed decision about which rail route to select, and flooding is an example of this.

4 On page 3-114 of the draft, it states that Native Americans live in the vicinity of two of the candidate rail corridors, Jean and Valley Modified, and this statement should be corrected to acknowledge that the Western Shoshone Dann sisters live in Crescent Valley in the vicinity of the proposed Carlin route.

5 The draft also uses 1990 census data which is clearly outdated for the State of Nevada, the fastest growing state in the union. Current data is available from the state demographer and should be used in the draft.

 Do not penalize Nevada for its growth rate or for the fact that this project is being proposed before the next national census.

6 Because over 87 percent of our county is managed by the Bureau of Land Management, it seems that more input is required from that agency regarding the variety of impacts that the rail route could have on land and resources that they manage.

 We were surprised to read in Appendix C that the Department only met once with BLM and that there are no ongoing communication or interactions mentioned regarding the Department's multi-faceted proposal.

 We would hope that BLM would not hold the Department's proposed action to any lesser standard than they require of the mining and the ranching industries.

7.... I have here the current draft from the Cortez South Pipeline project which was submitted several meetings ago to the Commissioners. This draft has the kind of detailed site specific information that the Department should be gathering for each proposed rail corridor at this time in order for there to be adequate information for route selection.

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Another area where the draft is deficient is in its treatment of existing rail and highway within Nevada. For example, from West Wendover to Beowawe, the interstate and Union Pacific rail line go through several communities and cross the Humboldt several times, and you would never know that from reading the draft.

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A major flaw in this draft is that the Department of Energy appears to want to disconnect the development of Yucca Mountain as a repository from the transportation of nuclear waste. As it stands now, the Department is not funding transportation development, and the draft reflects that priority.

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Since the origins and destination of the nuclear waste are known, the Department should have identified specific routes in the draft which would have informed communities along the country or throughout the country of the Department's plans.

This draft is not adequate to make an informed decision on modes and routes, even though the Department states that they intend to make routing decisions based only on the information in this draft. We believe it is inadequate and call upon the Department of Energy to release a new draft for public comment which corrects these deficiencies.

It is essential that the public and the affected units of local government have an opportunity to review and comment on the changes that the Department will make. A new draft will insure that the public has a voice. Thank you.